

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America

v.

Miguel A. Martinez Marquez and  
Tana Rose Fudge

Case No. M-21-304 -AMG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2021 in the county of Oklahoma in the  
Western District of Oklahoma, the defendant(s) violated:

*Code Section*  
21 U.S.C. § 846

*Offense Description*  
Conspiracy to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Robin Melodick, Drug Enforcement Administration (DEA), which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.



Complainant's signature

ROBIN MELODICK, Special Agent (DEA)

Printed name and title

Sworn to before me and signed in my presence.

Date:

5/18/21



Judge's signature

City and state:

Oklahoma City, Oklahoma

AMANDA MAXFIELD GREEN, U.S. Magistrate Judge

Printed name and title

**WESTERN DISTRICT OF OKLAHOMA  
OKLAHOMA CITY, OKLAHOMA**

**STATE OF OKLAHOMA    )  
                                  )  
COUNTY OF OKLAHOMA )**

**AFFIDAVIT**

I, Robin Melodick, a Special Agent (SA) with the Drug Enforcement Administration (DEA) under the Department of Justice having been duly sworn, depose and state as follows:

**INTRODUCTION**

1. This Affidavit is submitted in support of an application by the United States of America for a criminal complaint against MIGUEL A. MARTINEZ MARQUEZ and TANA ROSE FUDGE and for a violation of 21 U.S.C. § 846, conspiracy to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. My knowledge of the facts and circumstances alleged in this Affidavit come from my training and experience, my participation in this investigation, and my conversations with other law enforcement officers involved in this investigation. Because this Affidavit is submitted for the limited purpose of establishing probable cause to secure a complaint as

described herein, it does not include every fact known to me concerning the investigation.

3. I am an investigative or law enforcement officer within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the U.S. who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. I have been a Special Agent with DEA for approximately 16 years and I have worked numerous conspiracy investigations, including Title III wire cases, and complex, multi-jurisdictional investigations. I am well versed in a multitude of investigative methods, including working confidential sources, interviews, arrests, search warrants, seizure warrants, and analyzing cellular phone data.

#### PROBABLE CAUSE

4. On May 16, 2021, along Interstate 40 in Canadian County within the Western District of Oklahoma, Canadian County Sheriff's Office (CCSO) Deputy Sean Steadman conducted a traffic stop on a 2013, black Chevy Impala, bearing Arizona tag CRL4469 (rental car) traveling eastbound at mile marker 117. Deputy Steadman stopped the vehicle for following another vehicle at an unsafe distance. The driver, MARTINEZ MARQUEZ, had no driver's license and was asked to exit the vehicle. MARTINEZ MARQUEZ stated that he and his wife, Tana FUDGE (front passenger), were headed to Alabama to visit FUDGE's sister for approximately a week. When asked

where in Alabama, MARTINEZ MARQUEZ, stated he was not sure. According to Deputy Steadman's report, MARTINEZ MARQUEZ was extremely nervous throughout the encounter and would not make eye contact with Deputy Steadman.

5. FUDGE provided her driver's license and was asked how long they were staying in Alabama. She responded that they were staying one day and then would be returning to Arizona, contrary to what MARTINEZ MARQUEZ had said.

6. A records check revealed that MARTINEZ MARQUEZ's visa had expired in 2018 and he was in the United States illegally, a fact MARTINEZ MARQUEZ admitted to Deputy Steadman. When Deputy Steadman asked about his nervous behavior, MARTINEZ MARQUEZ advised that he was addicted to fentanyl and was nervous because he was going through withdrawals.

7. Deputy Steadman then asked MARTINEZ MARQUEZ if there were any narcotics inside the vehicle. He verbally answered "no" to the investigator except when he was asked about methamphetamine, to which MARTINEZ MARQUEZ just shook his head indicating a no answer. When Deputy Steadman advised MARTINEZ MARQUEZ that he believed that there was a large amount of narcotics in the vehicle, MARTINEZ MARQUEZ responded, "They have me, my wife, and my daughter." When he was again

asked if there was methamphetamine in the vehicle, MARTINEZ MARQUEZ responded, "Yep." MARTINEZ MARQUEZ then told Deputy Steadman that the drugs could be found in a pink suitcase and two smaller bags toward the rear of the vehicle and stated there were "25 bricks." When questioned, FUDGE also confirmed her knowledge of the presence of the narcotics in the vehicle.

8. After removing all occupants from the vehicle, Deputy Steadman deployed his K-9 partner to conduct a free-air sniff of the vehicle which resulted in a positive alert to the odor of narcotics coming from the vehicle. Deputy Steadman's K-9 partner is a certified narcotics detection dog trained to detect, among other things, the odor of methamphetamine.

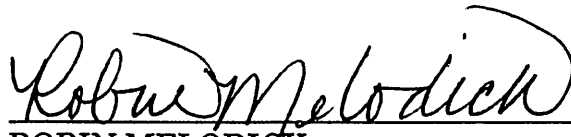
9. During a subsequent search, law enforcement located a pink suitcase, a "Tommy Hilfiger" bag, and a grey bag in the trunk of the vehicle. A further search of these items revealed 24 bundles, weighing approximately 50 pounds (approximately 22.7 kilograms) wrapped with cellophane, dryer sheets, soap, and scented trash bags. A field test was conducted with positive results for the presence of methamphetamine. Also discovered during the search were approximately two pounds of a white, powdery substance. Field tests of the powder for the presence of cocaine and heroin were negative, therefore, it is believed that the white powder is fentanyl. Formal lab testing

will be requested to determine the exact nature of this white powdery substance.

10. Prior to being transported to the Canadian County Jail, SA Melodick and DEA Task Force Officer (TFO) Brad Neff conducted separate post-*Miranda* interviews of FUDGE and MARTINEZ MARQUEZ. During her interview, FUDGE admitted to SA Melodick and TFO Neff that she knew about the drugs in the vehicle and that this was the second time she and MARTINEZ MARQUEZ had transported drugs, the first trip being to Birmingham, Alabama in April 2021. FUDGE also stated that for both trips she and MARTINEZ MARQUEZ departed their home in Tolleson, Arizona, traveled to California to pick up the drugs and then drove east. During his post-*Miranda* interview, MARTINEZ MARQUEZ admitted that he and FUDGE had transported drugs in April 2021 to Birmingham, Alabama for the same drug trafficking organization (DTO) and had picked up the drugs in Inglewood, California.

CONCLUSION

11. Based on the facts set forth in the Affidavit, I believe that there is probable cause to believe that MARTINEZ MARQUEZ and FUDGE have violated 21 U.S.C. § 846 and respectfully request that warrants be issued for their arrests.



ROBIN MELODICK  
Special Agent  
Drug Enforcement Administration

Subscribed and sworn to before me in my presence on this 18<sup>th</sup> day of May, 2021.



AMANDA MAXFIELD GREEN  
United States Magistrate Judge